

FILED

DEC 22 2011

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

)	Cr. No. 11-082S
UNITED STATES OF AMERICA)	
)	
)	<u>COUNT ONE:</u>
v.)	AGGRAVATED SEXUAL ABUSE - WITH
)	CHILDREN
)	18 U.S.C. § 2241(c)
)	
DONALD J. JONES, III)	<u>COUNT TWO:</u>
alias "Don Juan")	USE OF FACILITY OF INTERSTATE
)	COMMERCE TO ATTEMPT TO ENTICE A
)	MINOR TO ENGAGE IN SEXUAL ACTIVITY
)	18 U.S.C. § 2422(b)
)	
)	<u>COUNT THREE:</u>
)	TRAVELING TO ENGAGE IN ILLICIT
)	SEXUAL CONDUCT
)	18 U.S.C. § 2423(b) and (f)
)	
)	<u>COUNT FOUR:</u>
)	TRANSPORTATION OF CHILD
)	PORNOGRAPHY
)	18 U.S.C. § 2252(a)(1) and (b)(1)
)	
)	<u>COUNT FIVE:</u>
)	POSSESSION OF CHILD PORNOGRAPHY
)	18 U.S.C. § 2252(a)(4)(b) and (b)(2).
)	
)	<u>COUNT SIX:</u>
)	FELONY BY REGISTERED SEX OFFENDER
)	18 U.S.C. §§ 2260A
)	
)	18 U.S.C. §3559(e)(1)

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about the 8th day of April, 2011, in the District of Rhode Island, the defendant, DONALD J. JONES, III, alias "Don Juan," did knowingly cross a state line with the intent to engage in a sexual act, as defined in 18 U.S.C. § 2246(2), with a person who had not attained the age of 12 years.

All in violation of Title 18, United States Code, Section 2241(c).

COUNT TWO

From on or about the 21st day of March, 2011, including on or about the 8th day of April, 2011, in the District of Rhode Island, and elsewhere, the defendant, DONALD J. JONES, III, alias "Don Juan," did use a facility of interstate and foreign commerce, that is, the internet, to knowingly persuade, induce, entice, and coerce an individual, who had not attained the age of 18 years, to engage in sexual activity for which defendant could be charged with a criminal offense, that is, a criminal offense under the Rhode Island General Law, specifically First Degree Child Molestation Sexual Assault (R.I. Gen.Laws 1956, § 11-37-8.1) or Second Degree Child Molestation Sexual Assault (R.I. Gen.Laws 1956, § 11-37-8.3).

All in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

On or about the 8th day of March, 2011, in the District of Rhode Island, and elsewhere, the defendant, DONALD J. JONES, III, alias “Don Juan,” knowingly traveled in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), that is, a sexual act with a person who had not attained the age of 18 years, that would be in violation of Title 18, United States Code, chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b) and (f).

COUNT FOUR

From on or about the 28th day of March, 2011 to on or about the 5th day of April, 2011, in the District of Rhode Island and elsewhere, the defendant, DONALD J. JONES, III, alias “Don Juan,” did knowingly transport in interstate commerce, by any means and facility of interstate and foreign commerce, visual depictions of a minor engaging in sexually explicit conduct, and such visual depictions were produced using a minor and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

COUNT FIVE

On or about the 8th day of April, 2011, in the District of Rhode Island and elsewhere, the defendant, DONALD J. JONES, III, alias “Don Juan,” did knowingly possess at least one matter which contains any visual depiction that had been shipped and transported in and affecting

interstate and foreign commerce, the production of which involved the use of a minor engaging in sexually explicit conduct and such visual depictions was of such conduct

All in violation of Title 18, United States Code, Section 2252(a)(4)(b) and (b)(2).

COUNT SIX

On or about the 8th day of April, 2011, in the District of Rhode Island, the defendant, DONALD J. JONES, III, alias "Don Juan," who at that time was required to register as a sex offender under the law of the State of New Jersey, did knowingly commit any one of the felony offenses involving a minor as charged in Counts One through Three of this Indictment.

All in violation of Title 18, United States Code, Section 2260A.

FORFEITURE ALLEGATIONS

The allegations in Counts One through Six of this Indictment are re-alleged as if fully set forth herein for the purpose of giving the defendant, DONALD J. JONES, III, alias "Don Juan," notice that the United States intends to pursue forfeiture of property pursuant to Title 18, United States Code, Section 2253, as part of any sentence imposed herein.

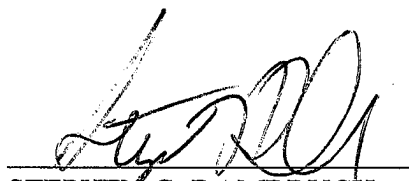
If convicted of one or more of the offenses alleged in Counts One through Six of this Indictment, the defendant, DONALD J. JONES, III, alias "Don Juan," shall forfeit to the United States the defendant's interest in any property, real and personal, used and intended to be used to commit and to promote the commission of such offense and offenses of which the defendant is convicted and any property traceable to such property including, but not limited to, a

Dell XPS Laptop Computer with a Western Digital hard drive, serial number WXEX08V40617,
and a Staples Relay Thumb Drive.

A TRUE BILL:

REDACTED

PETER F. NERONHA
United States Attorney



STEPHEN G. DAMBRUCH
Assistant U.S. Attorney
Criminal Chief



LESLIE J. KANE
Assistant U.S. Attorney

December 22, 2011
DATE